

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

DISABILITY RIGHTS VERMONT	)	
Plaintiff,	)	
	)	
v.	)	Case No. 5:19-cv-106
	)	
STATE OF VERMONT, DEPARTMENT	)	
FOR CHILDREN AND FAMILIES,	)	
KEN SCHATZ, COMMISSIONER,	)	
in his official capacity,	)	
JAY SIMONS, WOODSIDE JUVENILE	)	
REHABILITATION CENTER DIRECTOR,	)	
in his official capacity.	)	
Defendants.	)	

**STIPULATED MOTION FOR APPROVAL OF SETTLEMENT AGREEMENT**

The parties hereby request that the Court approve the attached Settlement Agreement and retain jurisdiction over this matter in accordance with the terms therein. In addition to the attached Settlement Agreement, the parties also submit the final policies that were implemented during the course of this litigation and that address issues raised in Plaintiff's Complaint.

WHEREFORE the parties request the Court approve the Settlement Agreement.

DATED at Montpelier, Vermont, this 20th day of March 2020.

DISABILITY RIGHTS VERMONT

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STATE OF VERMONT

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